

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

FREIGHTQUOTE.COM, INC.,

Plaintiff,

v.

PACIFIC ATLANTIC FREIGHT,

Defendant.

Civil Action No. 1:08-cv-00823

Judge St. Eve  
Magistrate Judge Nolan

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**STIPULATION**

In order for the parties to begin addressing the merits of this litigation without further delay, IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned, that:

1. Plaintiff withdraws its Motion for a Default Judgment against Pacific Atlantic Freight and requests that the Court vacate the entry of default against Pacific Atlantic Freight;
2. Dennis Gershman has been identified as the individual who operates a business using the fictitious business name Pacific Atlantic Freight.
3. Accordingly, the name of the Defendant will be corrected to "Dennis Gershman individually and d/b/a Pacific Atlantic Freight" and the caption in the case will be amended as shown in the attached proposed Amended Complaint (Exhibit 1).
4. After the entry of default against Pacific Atlantic Freight is vacated, Donald E. Morris, as counsel for Dennis Gershman individually and d/b/a Pacific Atlantic Freight, will accept service of the Amended Complaint by email at the following address: [don@cybertriallawyer.com](mailto:don@cybertriallawyer.com);
5. Upon service of the Amended Complaint, Defendant's Motion to Quash Service of Process and Motion to Dismiss will be rendered moot; and,
6. Defendant Dennis Gershman individually and d/b/a Pacific Atlantic Freight will serve an Answer to the Amended Complaint within twenty days of receipt of the email service.

Dated: April 28, 2008

SO STIPULATED:

FREIGHTQUOTE.COM, INC.

/s/ Raymond P. Niro, Jr.  
By: Raymond P. Niro, Jr.  
Dina M. Hayes  
NIRO, SCAVONE, HALLER & NIRO  
181 West Madison, Suite 4600  
Chicago, Illinois 60602 4515  
Phone: (312) 236-0733  
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rnirojr@nshn.com; hayes@nshn.com

DENNIS GERSHMAN individually and d/b/a PACIFIC ATLANTIC FREIGHT

/s/ Donald E. Morris  
*signed with permission*  
By: John W. Dozier, Jr., Esq., VA Bar # 20559  
*Pro Hac Vice* (Application Pending)  
jwd@cybertriallawyer.com  
Donald E. Morris, Esq., VA Bar # 72410  
*Pro Hac Vice* (Application Pending)  
don@cybertriallawyer.com  
DOZIER INTERNET LAW, P.C.  
301 Concourse Blvd.  
West Shore III, Suite 300  
Glen Allen, VA 23059  
Phone: (804) 346-9770  
Fax: (804) 346-0800

**CERTIFICATE OF SERVICE**

I hereby certify that on April 28, 2008, I caused the foregoing STIPULATION to be electronically filed with the Clerk of the Court using the CM/ECF system, and that copies were served upon Defendant via electronic transmission through his counsel:

John W. Dozier, Jr.  
Donald E. Morris  
DOZIER INTERNET LAW, P.C.  
301 Concourse Blvd.  
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(804) 346-9770  
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[don@cybertriallawyer.com](mailto:don@cybertriallawyer.com)

Attorneys for Defendant  
Dennis Gershman individually  
and d/b/a Pacific Atlantic Freight

In addition, I certify that on this date I caused a copy of the proposed Order to be submitted to Judge St. Eve and copied to the above-listed counsel via electronic transmission pursuant to the Court's ECF procedures.

/s/ Raymond P. Niro, Jr.  
Attorney for Plaintiff